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March 27, 2018

**Via ECF**

The Honorable Steven C. Mannion, U.S.M.J.  
United States District Court for the District of New Jersey  
Martin Luther King, Jr. Bldg. & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

**Re: *White, et al. v. LG Electronics, Inc., et al.***  
**Civil Action No. 17-1775 (MCA)(SCM)**

Dear Magistrate Judge Mannion:

We, along with Latham & Watkins LLP, represent Defendant LG Electronics U.S.A., Inc. (“LG”), and write on behalf of LG, Sony Electronics Inc., and Samsung Electronics America, Inc. (collectively, “Defendants”), to respond briefly to the March 22, 2018 letter of Plaintiffs’ counsel [D.E. 61-1]. The statements in that letter are not true, as the email correspondence among counsel can confirm. In the absence of any effort from Plaintiffs’ counsel to meet and confer, Defendants affirmatively, timely, and repeatedly sought to do so. We look forward to meeting with the Court at the Rule 16 conference on March 28, 2018.

Respectfully submitted,

/s/ *Jeffrey J. Greenbaum*

JEFFREY J. GREENBAUM

cc: Hon. Madeline Cox Arleo, U.S.D.J. (via ECF)  
All counsel of record (via ECF)